

Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1, 14-16, 18, 20-26 and 28-51 are pending in the application, with 1, 14, 16, 18, 21, 30, and 49-51 being the independent claims. Claims 2-13 are sought to be cancelled without prejudice to or disclaimer of the subject matter therein. Claims 17, 19, and 27 were previously canceled. New claims 31-51 are sought to be added. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

Rejections under 35 U.S.C. § 112 and Claim Objections

In paragraph 2 of the Office Action, claims 2-13 were rejected under 35 U.S.C. § 112, fourth paragraph, because "these claims do not incorporate all of the limitations of the claims to which they refer." In paragraph 3 of the Office Action, claims 7-13 were objected to under 37 C.F.R. § 1.75(c), as "being of improper dependent form for failing to further limit the subject matter of a previous claim-specifically, these claims fail to further limit steps (3a), (3b), and (3c) of independent claim 1." Without acquiescing to these rejections and objections, Applicants have canceled claims 2-13. Thus, these rejections and objections are now moot. Applicants reserve the right to pursue claims 2-13 at a future date.

Rejections under 35 U.S.C. § 102

On page 3 of the Office Action, claims 1-16, 18, 20-26, and 28-30 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,862,325 to Reed *et al.* (hereinafter Reed). Applicants respectfully traverse the rejection, and request that it be withdrawn.

Reed does not teach all of the features of independent claim 1. For example, Reed does not teach maintaining state information on behalf of the device, wherein the state information is specification data of the device. Thus, the embodiment of claim 1 is different from Reed.

On page 4, the Office Action cites col. 24, line 53-col. 25, line 52 and col. 15, line 63-col. 16, line 14 of Reed as teaching maintaining state information on behalf of an entity. However, upon review of these portions of Reed, Applicants do not find the alleged teachings. For example, in col. 24, lines 59-64, Reed states:

A first technique is to employ an algorithm that uses system state information together with data unique to the computer on which it is being run to produce system IDs whose probability of uniqueness is so high that for practical purposes they can be treated as unique.

Thus, Reed describes using system state information with other data to produce unique system IDs. Furthermore, in col. 16, lines 6-9, Reed mentions a "state machine."

However, nowhere in the portions of Reed referred to in the Office Action does Reed teach *maintaining state information* on behalf of a device, nor does Reed teach the state information being *specification data of the device*, as recited in claim 1. Producing unique IDs with system state information is not the same as maintaining state

information on behalf of a device, where the state information is specification data of the device. Furthermore, a "state machine" does not even relate to "state information" as claimed. Thus, Reed does not teach each and every element of independent claim 1.

Accordingly, Applicants respectfully submit that independent claim 1 is patentable over Reed, for at least these reasons. Independent claims 14, 16, 18, 21, 30, 49-51 are also patentable over Reed at least for reasons similar to those described above, and further with respect to their own features. Furthermore, claims 28 and 31-33, which depend from claim 1, claims 15 and 34-36, which depend from claim 14, claims 37-39, which depend from claim 16, claims 20 and 40-42, which depend from claim 18, claims 22-26, 29, and 41-45, which depend from claim 21, and claims 46-48, which depend from claim 30, are also patentable over Reed for at least these reasons, and further in view of their own features.

Thus, Applicants respectfully request that this rejection be reconsidered and withdrawn.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will

expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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